

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JOSEPH GREEN, JR.,

Plaintiff,

v

Case No: 17-cv-12780

STAR LINE MACKINAC ISLAND FERRY
SERVICE, INC.,

Defendant.

COMPLAINT

NOW COMES Plaintiff, by and through counsel undersigned, O'BRYAN BAUN KARAMANIAN, complaining against Defendant as follows:

1. Jurisdiction and venue lie in this action, Defendant conducting business within this forum's boundaries.
2. Jurisdiction is founded under (A) 33 U.S.C. 905(b), or (B) under the Jones Act (46 U.S.C. 30104) for negligence, and/or under the general maritime law for unseaworthiness, maintenance and cure.
3. At all times material to issues herein Plaintiff served as an employee of Defendant as a (a) vessel repairman with Defendant's negligence being in its capacity of a vessel owner, or (b) a crewmember of Defendant's fleet of vessels, with all acts and/or omissions giving rise to this action occurring in the course of Plaintiff's employment.
4. On or about March 27, 2017, Plaintiff was injured because of an inoperable/unseaworthy vessel having to be pulled by lines by men, including Plaintiff, on

Defendant's poorly maintained, irregular dock that required that Plaintiff take non-ergonomically correct positions in pulling said lines, with Plaintiff suffering injury as a result thereof.

5. Defendant's tortious acts aforesaid caused or contributed to Plaintiff's damages, *inter alia*, as follows:

- a. Pain and suffering, past future;
- b. Mortification, humiliation, fright shock and embarrassment;
- c. Loss of earnings and earning capacity;
- d. Hospital, pharmaceutical and other cure expenses;
- e. Aggravation of prior condition, if any there be;
- f. Inability to engage in social, recreational, and other pursuits previously enjoyed;
- g. Mental anguish;
- h. In the Alternative:
 - a) Found;
 - b) Maintenance and cure.

WHEREFORE, Plaintiff demands trial by jury and judgment against Defendant, together with interest, costs, attorney fees and expenses, all to be methodically adjusted upwards during the pendency of this cause.

O'BRYAN BAUN KARAMANIAN

/s/ Dennis M. O'Bryan

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DEMAND FOR TRIAL BY JURY

NOW COMES Plaintiff, by and through counsel undersigned, O'BRYAN BAUN
KARAMANIAN, and hereby demands trial by jury in the above-referenced cause of action.

O'BRYAN BAUN KARAMANIAN

/s/ Dennis M. O'Bryan

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